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12	UNITED STATES DI	STRICT COURT
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13	NORTHERN DISTRICT	OF CALIFORNIA
14	(CANIED ANGICO	O DIMIGIOM)
	(SAN FRANCISC	O DIVISION)
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17	JENNIFER CHANG, by and through her parents,	Case No.: C 06-02337 JSW (MEJ)
1,	NORMAN and LINA CHANG,	
18		STIPULATION AND JOINT MOTION
	Plaintiffs,	FOR DISMISSAL OF COMPLAINT AND
19		CIVIL ACTION AGAINST
30	v.	DEFENDANTS CALIFORNIA SCHOOL
20		FOR THE DEAF-FREMONT AND THE
21	CALIFORNIA SCHOOL FOR THE DEAF,	CALIFORNIA DEPARTMENT OF
	CALIFORNIA DEPARTMENT OF	EDUCATION AND [PROPOSED] ORDER
22	EDUCATION, and FREMONT UNIFIED	ORDER
	SCHOOL DISTRICT,	
23		
24	Defendants.	
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-	J.C. v. CSD, et al.	Case No. C 06-02337 JSW (MEJ)

Plaintiff J.C., by and through her parents, Norman and Lina C., ("Plaintiffs") and 1 2 Defendants California School for the Deaf-Fremont ("CSD") and California Department of Education ("CDE") stipulate as follows: 3 Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiffs and Defendants CSD and 1. 4 CDE hereby jointly move this Court to dismiss all legal claims and allegations against FUSD in 5 the civil action Case No. C-06-02337 JSW. Such dismissal shall be subject to the terms of this 6 Court's August 31, 2007 "Order Approving Settlement Agreement with Limited Jurisdiction of 7 the Court" and the "Settlement Agreement with Limited Jurisdiction of the Court," Paragraph 8 III.A. of the Settlement Agreement provides in part: "The Court shall retain jurisdiction over 9 this matter for three years to ensure compliance with this Agreement During that time 10 period, the Court shall have the authority to enter any additional orders it deems appropriate to 11 ensure compliance with the express terms of this Agreement." 12 2. On July 30, 2007, this Court ordered the dismissal of Plaintiffs' claims against 13 Defendant Fremont Unified School District. Thus no claims would remain pending before this 14 Court should the Court approve this stipulation and order dismissal of the claims against the 15 CSD and CDE. **16** 3. Having resolved all pending claims against Defendant CSD and CDE in this case, **17** Plaintiffs and Defendants CSD and CDE respectfully request that the Court dismiss this case 18 pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii) and subject to subject to the terms of this Court's 19 August 31, 2007 "Order Approving Settlement Agreement with Limited Jurisdiction of the 20 Court" and the "Settlement Agreement with Limited Jurisdiction of the Court," both of which 21 provide limited continuing jurisdiction of this Court. 22 111 23 111 24 /// 25 /// 26 /// 27 J.C. v. CSD, et al. 28 Case No. C 06-02337 JSW (MEJ)

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6			am S. Koski DLEGAL CLINIC
7		Youth & Educ	CATION LAW PROJECT nm S. Koski
8		Willia	n F. Abrams
9 10		Mazen	M. Basrawi ICCUTCHEN, LLP
11			s for Plaintiffs
12			and through her parents, and Lina Chang
13	DATED: September, 2007		
14		~ _	_
15		CALIFORNIA DEPARTMEN	IT OF EDUCATION
16			
17		By: //S	//
18		Reb	ecca Freie
19		California Schoo	for Defendants I for the Deaf-Fremont artment of Education
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2	Stanford Legal Clinic		
3		STANFORD LEGAL CLINIC	
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5		By: //\$//	
6		William S. Koski	
U		Stanford Legal Clinic Youth & Education Law Project	
7		William S. Koski	
8		William S. Alogri	
		William F. Abrams	
9		Mazen M. Basrawi	
10		BINGHAM MCCUTCHEN, LLP	
		Attorneys for Plaintiffs	
11		Jennifer Chang, by and through her parents,	
12		Norman and Lina Chang	
13	DATED: September 14, 2007		
14			
15		CALIFORNIA DEPARTMENT OF EDUCATION	
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17		Nahana da -	
18		By: Rebecca Freie	
		Attorneys for Defendants	
19		California School for the Deaf-Fremont California Department of Education	
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28	J.C. v. CSD, et al.	2	
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1	[PROPOSED] ORDER				
2	Having read and considered the Stipulation and Joint Motion for Dismissal of Defendant				
3	California School for the Deaf-Fremont and California Department of Education, the Court				
4	HEREBY ORDERS THAT: Fremont Unified School District shall be dismissed pursuant to				
5	Fed. R. Civ. Proc. 41(a)(1)(A)(ii) and subject to the terms of this Court's August 31, 2007				
6	"Order Approving Settlement Agreement with Limited Jurisdiction of the Court" and the				
7	"Settlement Agreement with Limited Jurisdiction of the Court," both of which provide limited				
8	continuing jurisdiction of this Court.				
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10	DATED: September 17, 2007 Hon. Jewice 1. White				
11	Hon. Jewrer 3. White				
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Case No. C 06-02337 JSW (MEJ)

J.C. v. CSD, et al.